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21 GOLDEN STATE FARM CREDIT, FLCA

22 UNITED STATES DISTRICT COURT

23 FOR THE EASTERN DISTRICT OF CALIFORNIA

24 BANK OF AMERICA, N.A., a national  
25 banking association,

Case No. 2:24-cv-02309-DJC-CKD

26 Plaintiff,  
27 v.  
28 CAPITAL MED FARMS, LLC, et al.,  
Defendants.

**STIPULATION OF PLAINTIFF AND  
DEFENDANT GOLDEN STATE FARM  
CREDIT, FLCA TO EXTEND  
DEADLINE TO ANSWER;  
ORDER**

29 **STIPULATION**

30 Plaintiff Bank of America, N.A. (“**BOA**”) and Defendant Golden State Farm Credit,  
31 FLCA (“**GSFC**”) by and through their undersigned attorneys, hereby stipulate as set forth  
32 below:

33 **RECITALS**

34 WHEREAS, on or about August 23, 2024, BOA filed its initial Complaint in this  
35 action;

WHEREAS, on September 27, 2024, BOA filed its First Amended Complaint (“FAC”) (Dkt. 10);

WHEREAS, the current deadline for GSFC to answer or otherwise respond to the  
FAC is December 2, 2024;

WHEREAS, the Rule 12(b) motion of Defendant TSB AG, Inc. to dismiss the FAC (“**TSB’s Motion**”) is currently set for hearing on March 20, 2025;

WHEREAS, a majority of the other defendants' deadlines to respond to the FAC have not yet passed and no scheduling conference has been set:

WHEREAS, no previous request to continue the response deadline for GSFC has been sought or granted:

WHEREAS, GSFC does not intend to file a motion under Rule 12(b);

NOW THEREFORE, BOA and GSFC, by and through their respective counsel, hereby stipulate that GSFC's answer to the FAC shall be due on or before the date that is fourteen (14) calendar days after the Court enters its order resolving TSB's Motion.

Dated: November 27, 2024

HOLLAND & KNIGHT LLP

By: /s/ Kristina S. Azlin  
Kristina S. Azlin  
Attorneys for Plaintiff  
BANK OF AMERICA, N.A.

Dated: November 27, 2024

FRIEDMAN & SPRINGWATER LLP

By: /s/ Ruth Stoner Muzzin (as authorized on  
11/27/2024)  
Ruth Stoner Muzzin  
Attorneys for Defendant  
GOLDEN STATE FARM CREDIT, ETC.

## **IT IS SO ORDERED**

Dated: November 27, 2024

By: /s/ Daniel J. Calabretta  
THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE